

**Audubon Mississippi * Gulf Islands Conservancy, Inc. * Healthy Gulf
Land Trust for the Mississippi Coastal Plain * Mississippi Wildlife Federation
National Wildlife Federation * The Corps Network * The Nature Conservancy**

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Submitted via Electronic Mail: mgreen@mdeq.ms.gov

Chris Wells
Chief of Staff and Interim Director, Office of Restoration
Mississippi Department of Environmental Quality
C/o Melanie Green
515 East Amite Street
Jackson, MS 39201

Re: Comments on Mississippi State Expenditure Plan (MSEP) 2019 Amendment

Dear Director Wells,

The Mississippi Environment Focus Group (MEFG) appreciates the Mississippi Department of Environmental Quality's (MDEQ) continued leadership of our state's recovery from the 2010 Deepwater Horizon oil disaster.

MEFG considers the Mississippi State Expenditure Plan (MSEP) 2019 Amendment a valuable part of the state's restoration effort so as to maximize recovery investments, enhance coordination and leveraging opportunities, and deliver lasting benefits for our coast, communities, and economy.

Thank you for the opportunity to review the MSEP 2019 Amendment, and we offer the following recommendations for your consideration.

General Comments

MEFG truly appreciates the preliminary briefings that MDEQ provides to us on restoration planning and anticipated projects in advance of their public release. We believe such an open, constructive dialogue with you enhances restoration projects, especially by providing a venue where our groups can share our collective knowledge and expertise, and identify possible synergies. We hope our conversations with you will remain a part of future planning efforts.

Notably, since the RESTORE Spill Impact Component may be used to fund ecological and economic projects, we are pleased that the projects in this MSEP Amendment prioritize environmental benefits. We believe that restoration projects should not pose direct or indirect adverse environmental impacts; the MSEP 2019 Amendment appears to reflect this standard. We encourage future MSEP Amendments to maintain a similar ecological focus and that proposed projects avoid elements that would degrade or negatively affect the coast's natural resources and/or reduce the impact of, or conflict with, completed or planned ecological restoration investments.

Project-Specific Comments

Activity #1: Mississippi Gulf Coast Water Quality Improvement Program; Budget: \$7,000,000; Total MSEP Project Budget: \$56,000,000¹

MEFG supports further restoration investments in projects that protect and restore Mississippi's coastal water resources. 'Improving Water Resources' is one of nine goals discussed at length in our coalition's [*Restoration Framework: A Vision to Support Comprehensive Restoration for Coastal Mississippi*](#) (October 2016).

We believe the activities described within this program reflect many of the strategies outlined in our Restoration Framework, such as addressing inadequate or poorly maintained storm water and wastewater infrastructure. Our Framework also acknowledges that many coastal water quality problems result from outdated land use policies, a need for stronger public education, and a lack of enforcement of pollution control regulations. As MDEQ develops and implements this Water Quality Improvement Program, MEFG urges the agency to identify and to integrate approaches to address policy, education, and enforcement obstacles.

Activity #9: Beneficial Use of Dredge Material for Marsh Creation and Restoration in Mississippi; Budget: \$7,000,000; Total MSEP Project Budget: \$19,000,000

MEFG's [*Restoration Framework*](#) recognized the Beneficial Use of Dredged Material (BUDM) as an important habitat restoration strategy, especially for protecting and conserving marine, coastal estuarine and riparian habitats (p. 5), and creating, restoring and enhancing barrier and coastal islands and headlands (p. 6).

When this project was initially proposed in the MSEP 2018 Amendment, our comments to MDEQ (dated January 18, 2019), discussed our interest in seeing this activity guided by coastal Mississippi's ecological priorities (i.e. coastal areas experiencing erosion or threatened by wetland loss), rather the result of county or municipally-based priorities.

Specifically, our 2019 letter noted, *"We would like to see [Beneficial Use (BU)] disposal sites selected in a way that prioritize those coastal areas with the highest erosion rates as well as site designs that maximizes their direct and indirect ecological benefits. We also recommend setting acreage goal targets (annually/total program) for restoring/creating habitat to illustrate how the program will work comprehensively across the coast and in tandem with other existing BU efforts program, will provide added benefits for wildlife and marine resources, recreation and coastal resilience, and will accommodate adaptive management as needed for the short and long-term."*

We reiterate our 2019 recommendation that MDEQ partner with the Mississippi Department of Marine Resources to develop a strategic, science-based plan that prioritizes the coast's ecological needs and identifies current/planned BUDM opportunities. With \$7,000,000 additionally awarded to this activity, such a roadmap is of particular importance to us. An effective plan would describe approaches that best support coastal wildlife and habitats and that strengthen protections for coastal communities from

¹ Mississippi's Initial 2016 Multiyear Implementation Plan awarded an additional \$11 million toward this program (i.e. *Activity #12: Mississippi Gulf Coast Water Quality Improvement Program*).

storm events and flooding. A useful planning resource may be the [Gulf of Mexico Alliance's Technical Framework for the Gulf Regional Sediment Management Master Plan](#).

Our 2019 letter identified several possible funding sources for counties and municipalities that face recurring BUDM-related activity costs, such as Gulf of Mexico Energy Security Act (GOMESA) monies, Mississippi Tidelands Trust Funds, or the BP economic damage monies that were legislatively directed and are now available to the six coastal counties (i.e. \$22.5 million dollars a year from July 2019-2033).

Activity #11: Mississippi Beachfront Resilience; Budget: \$5,000,000

MEFG supports this new activity as it reflects our strong interest in restoration projects that provide multiple environmental, community, and economic benefits. We are glad to see the natural infrastructure approach this proposal implies, specifically establishing dune habitat that would benefit wildlife while strengthening the resiliency of nearby infrastructure and local communities against storm events and flooding hazards. Notably we are interested to see how this MSEP proposal can be complimentary to Harrison County Sand Beach Authority's recent GOMESA award for dune planting. We do question, however, whether three months of plant survival success is an adequate metric to achieve a successful, sustainable dune formation that can stand the test of time.

Providing additional boardwalks for public access will expand recreational access to and use of Mississippi's beaches, which are a key part of our tourism economy and local culture. We recommend priority consideration be given to using green design and materials wherever possible to ensure an environmentally conscious footprint.

We offer our member groups' on-the-ground expertise to help inform the project's planning, implementation, and monitoring. We encourage MDEQ to prioritize natural infrastructure in the design of future restoration projects, regardless of their funding source.

In closing, thank you for your effort to develop this plan and for your consideration of our comments. Please do not hesitate to reach out to discuss our recommendations, or to let us know how we can further support Mississippi's restoration efforts.

Sincerely yours,

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